

1 GRANT P. FONDO (SBN 181530)
GFondo@goodwinlaw.com
2 FARZAD FEYZI (SBN 343538)
FFeyzi@goodwinlaw.com
3 NIRAV BHARDWAJ (SBN 350829)
NBhardwaj@goodwinlaw.com
4 **GOODWIN PROCTER LLP**
601 Marshall Street
5 Redwood City, CA 94063
Tel: +1 650 752 3100
6 Fax: +1 650 853 1038

7 DARRYL M. WOO (SBN 100513)
DWoo@goodwinlaw.com
8 JESSICA HUANG FUZELLIER (SBN 315208)
JHFuzellier@goodwinlaw.com
9 DAVID RAPP-KIRSHNER (SBN 344494)
DRappKirshner@goodwinlaw.com
10 **GOODWIN PROCTER LLP**
525 Market St, 32nd Floor
11 San Francisco, CA 94111
Tel.: +1 415 733 6000
12 Fax: +1 415 677 9041

13 Attorneys for Defendant
LINWEI DING

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 UNITED STATES OF AMERICA,
19 Plaintiff,
20 v.
21 LINWEI DING,
22 Defendant.

23 Case No. 3:24-CR-00141-VC

24
25 **DEFENDANT LINWEI DING'S WITNESS**
26 **LIST**

1 Pursuant to the Court's August 6, 2025, Order Granting Joint Stipulation to Modify
2 Deadlines and Set Pretrial Schedule (ECF 114), Defendant Linwei Ding ("Mr. Ding") hereby
3 submits the following list of witnesses he anticipates he may call at trial.

4 Mr. Ding has a constitutional right not to disclose any witness that he may call to rebut any
5 portion of the evidence that the government may present in its case, and the failure to disclose any
6 such witness in this filing is not a waiver of Mr. Ding's rights to call such witnesses and present
7 their testimony. U.S. Const. amend. V & VI. Mr. Ding furthermore reserves the right to call any
8 witness noticed by the government in its witness list.

9 Mr. Ding reserves his constitutional right to testify at trial in his own defense. Mr. Ding
10 may also seek to and reserves the right to supplement or modify this list before trial as his trial
11 preparations continue and to call additional witnesses at trial as may be necessary. In the event
12 such a decision is made, Mr. Ding shall inform the Court and prosecution of any such changes to
13 this list.

14 Without waiving the foregoing legal arguments, Mr. Ding hereby submits the following list
15 of witnesses who he anticipates he may call at trial:

- 16 1. Shruti Arora
- 17 2. Prashant Chandra
- 18 3. Yihua Ding
- 19 4. Odette Du
- 20 5. Mark Eskridge
- 21 6. Hany Farag
- 22 7. Brad Fuller
- 23 8. Yang Gao
- 24 9. Alireza Ghaffarkhah
- 25 10. Mingfeng Gong
- 26 11. Maya Haridasan
- 27 12. Smeeta Jalan
- 28 13. Norman Jouppi

1 14. Mazy Ma
2 15. Michael Maffei
3 16. Neil Martin
4 17. Aamer Mahmood
5 18. Isaac Pflaum
6 19. James Pooley
7 20. Jarek Przybylowicz
8 21. Kamran Shafiei
9 22. Wei Shen
10 23. Matt Sparks
11 24. Andy Swing
12 25. Mukarram Tariq
13 26. Kexin Yang
14 27. Xiao Zhang
15 28. Yanrui Zhang
16 29. Jiafan Zhu
17 30. In the absence of stipulations, Mr. Ding anticipates calling records custodian(s) for
18 Google, LLC.
19 31. Mr. Ding reserves the right to call all persons listed as inventors on the patents relied or
20 referenced in the expert report of Daniel Sanchez.

Dated: September 2, 2025

Respectfully submitted,

GOODWIN PROCTER LLP

By: /s/ Grant P. Fondo
DARRYL M. WOO (SBN 100513)
DWoo@goodwinlaw.com
GRANT P. FONDO (SBN 181530)
GFondo@goodwinlaw.com
JESSICA HUANG FUZELLIER (SBN 315208)
JHFuzellier@goodwinlaw.com
FARZAD FEYZI (SBN 343538)
FFeyzi@goodwinlaw.com

1 DAVID RAPP-KIRSHNER (SBN 344494)
2 *DRappKirshner@goodwinlaw.com*
3 NIRAV BHARDWAJ (SBN 350829)
4 *NBhardwaj@goodwinlaw.com*
5 **GOODWIN PROCTER LLP**

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11 Attorneys for Defendant
12 LINWEI DING
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **September 2, 2025**. I further certify that all participants in the case are registered CM/ ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on
September 2, 2025.

/s/ *Grant P. Fondo*

Grant P. Fondo